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15  
16 IN THE UNITED STATES DISTRICT COURT  
17 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
18 SAN FRANCISCO DIVISION  
19

20 **DEXTER E. DALE,**

21 Plaintiff,

22 v.

23 **L. FERNANDEZ, L. LOUGH,**

24 Defendants.  
25

C 05-1842 JSW (PR)

**STIPULATION AND ORDER TO  
EXTEND DISCLOSURE OF EXPERT  
WITNESSES**

26  
27 The parties to this action, plaintiff Dexter Dale ("plaintiff") and Louella Fernandez and  
28 Lillian Lough ("defendants"), hereby stipulate as follows:

1 WHEREAS, this Court set the close of non-expert discovery as March 1, 2012, and the  
2 last day for expert discovery as April 1, 2012 (D.I. 50). On March 1, 2012 the Court ordered that  
3 Plaintiff may hold the depositions of Defendant Lough and CTF's Rule 30(b)(6) witness after the  
4 discovery cutoff date of March 1, 2012 (D.I. 68).

5 WHEREAS, due to Defendant Lough's health and travel conflicts, the parties have not yet  
6 been able to hold the deposition of Defendant Lough, and the parties' experts will not be able to  
7 review Defendant Lough's testimony until after the last day for expert discovery.

8 WHEREAS, certain discovery disputes regarding document productions have not yet been  
9 resolved (D.I. 72). If produced, these documents will be relevant to any expert analysis.

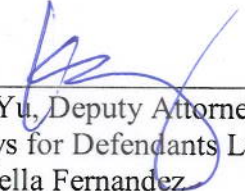
10 WHEREAS, the proposed extension of expert discovery will not affect the current trial  
11 schedule.

1 IT IS HEREBY STIPULATED AND AGREED SUBJECT TO APPROVAL OF THE  
2 COURT THAT:

- 3 1. The disclosure of expert witnesses is to be extended to May 4, 2012.  
4 2. The depositions of expert witnesses must be completed by June 1, 2012.

5  
6 Dated: March 20, 2012

KAMALA HARRIS, Attorney General  
of the State of California

7  
8  
9 By:   
10 Kay K. Yu, Deputy Attorney General  
11 Attorneys for Defendants Lillian Lough  
and Louella Fernandez

12 Dated: March 20, 2012

DECHERT LLP  
H. JOSEPH ESCHER III  
AMY THAYER  
CARL GISMERVIG

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14  
15 By: \_\_\_\_\_  
16 Carl Gismervig  
17 Attorney for plaintiff  
Dexter Dale

18 IT IS SO ORDERED.  
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21 \_\_\_\_\_  
THE HONORABLE JEFFREY S WHITE  
22 United States District Judge  
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27  
28

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13 AMY THAYER  
14 CARL GISMERVIG

15 By:

16   
17 Carl Gismervig  
18 Attorney for plaintiff  
19 Dexter Dale

20 IT IS SO ORDERED.

21 March 21, 2012

22   
23 THE HONORABLE JEFFREY S. WHITE  
24 United States District Judge